

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
)  
)  
v. )  
)  
)  
JUAN PAGAN, )  
a/k/a "PAPA, " )  
)  
Defendant. )

CRIM. NO. 05-30019-MAP

FILED  
CLERK'S OFFICE  
2005 NOV -9 P 3:55  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

**GOVERNMENT'S FIRST MOTION FOR EXCLUDABLE DELAY  
PURSUANT TO THE SPEEDY TRIAL ACT, 18 U.S.C. § 3161**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, submits the following motion for an order of excludable delay for the following periods of time:

1. from September 19, 2005, the date of the defendant's initial appearance and arraignment at which time the defendant indicated his interest in participating in automatic discovery, through October 3, 2005, the date on which the government produced its automatic discovery, pursuant to L.R. 112.2 and 18 U.S.C. § 3161(h)(8)(A); and

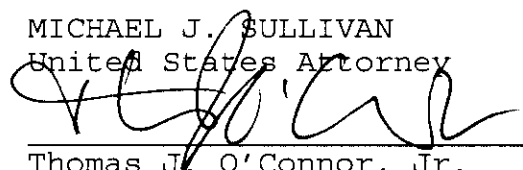
2. from October 14, 2005, the date on which the defendant's current counsel entered his appearance, through December 21, 2005, the scheduled date for an interim status conference in this matter, during which time defense counsel will be obtaining from predecessor counsel and evaluating the automatic discovery previously provided by the government and

during which time the parties will be contemplating and preparing potential discovery request letters and discovery motions, pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
Thomas J. O'Connor, Jr.  
Assistant U.S. Attorney

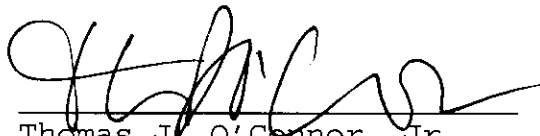
Dated: November 9, 2005

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Joseph D. Bernard, Esq.  
73 State Street  
Springfield, MA 01103

This 9th day of November, 2005.

  
Thomas J. O'Connor, Jr.  
ASSISTANT U.S. ATTORNEY